

**From:** [Fugh, Justina \(she/her/hers\)](#)  
**To:** [Li, Jake](#)  
**Cc:** [Griffo, Shannon](#)  
**Subject:** Approval of outside activity request to serve on board of Save The Snakes  
**Date:** Tuesday, May 16, 2023 1:26:20 PM

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Hi Jake,

You asked whether you may serve on the board of directors of a 501(c)(3) nonprofit organization called Save The Snakes, which focuses on snake conservation in the US and globally, particularly by reducing human-snake conflict. You will not be compensated for this activity but you will serve in a fiduciary role. Based on the information you have provided, **I am approving your request** as consistent with 5 C.F.R. Part 2635, Subpart H. Please note that, generally, an approval for outside employment remains valid for five years, though you must request a new approval should there be a change in the nature or scope of your duties. Please note the following ethics reminders:

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FINANCIAL CONFLICT OF INTEREST

Because you are serving in a fiduciary role, the interests of the organization will be imputed to you under 18 U.S.C. § 208. You will have a financial conflict of interest with Save The Snakes, so cannot participate personally and substantially in any particular matter that will have a direct and predictable financial effect upon it as a specific party or as a member of an affected class. Do not participate in your EPA duties in any matter that will have a direct and predictable financial effect upon the organization.

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REPRESENTATIONAL CONFLICT OF INTEREST

You are subject to the representational conflict of interest statutes set forth at 18 U.S.C. § 203 and 205. You cannot represent Save The Snakes or any outside entity as agent or attorney in connection with any matter in which the United States is a party or has a direct and substantial interest and, if you were compensated, could not receive any payment for anyone else's representational services. Remember that you cannot contact any United States government official on behalf of Save the Snakes, for example, even on your own time. If there is a federal official presenting to or appearing before the board or organization, or if they wish to communicate with any federal employee, then do not participate.

MISUSE OF POSITION

Be mindful about the Agency's [Limited Personal Use of Equipment policy](#). Do not use EPA equipment -- including phones, workspace, computer or time -- in connection with this activity. Do not use or allow the use of your EPA position, title, affiliation or email/phone number on the organization's website. You are not representing EPA in connection with this activity. While teleworking, be mindful of the fact that your home is your federal workplace. When you are "on the EPA clock" (that is, your duty hours), do not also work on this outside activity. You must be careful to delineate between your official time and use of our resources, and your personal time. Do not EPA equipment, including the computer or email address, in

connection with this outside activity.

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#### FUNDRAISING

In your personal capacity only, you may engage in fundraising for Save The Snakes, but please remember that you may never solicit funds from a subordinate or from any person whom you know to be a prohibited source of the Agency's (meaning any one doing business with or regulated by EPA). You also can never use your EPA position or title in connection with any fundraising efforts.

#### REPORTING OBLIGATION

Please remember to report this outside position on your next financial disclosure report that covers CY 2023 (that will be due May 15, 2024).

As always, if you have any questions, please let me know. I will include a copy of this note in your 278 file on our shared drive.

Justina

Justina Fugh (she/her) | Director, Ethics Office | Office of General Counsel | US EPA | Mail Code 2311A | Room 4308 North, William Jefferson Clinton Federal Building | Washington, DC 20460 | phone 202-564-1786

Send general ethics questions to [ethics@epa.gov](mailto:ethics@epa.gov) and we will get back to you.

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**From:** Li, Jake <Li.Jake@epa.gov>  
**Sent:** Friday, May 5, 2023 10:55 AM  
**To:** Fugh, Justina (she/her/hers) <Fugh.Justina@epa.gov>  
**Cc:** Griffo, Shannon <Griffo.Shannon@epa.gov>  
**Subject:** Outside activity request to serve on board of NGO

Hi Justina,

I appreciate your emails on the financial disclosure deadline. I will get that done before the deadline.

For now, I wanted to submit the following outside activity requests to serve on the board of a nonprofit organization. I did connect with Shannon about this and she sent me the instructions to submit the request as follows.

- name, title and grade;

Ya-Wei (Jake) Li; Deputy Assistant Administrator for Pesticide Programs, OCSPP;  
Schedule C GS-15

- the nature of the outside activity, including a full description of the services to be performed and the amount of compensation expected;  
To serve on the board of directors of a 501(c)(3) nonprofit organization called Save the Snakes, which focuses on snake conservation in the US and globally, particularly by reducing human-snake conflict (e.g., snakebites in rural agricultural areas). My services will focus on helping to grow the organization, including by participating in strategic planning, fundraising, oversight of grants and projects, and helping the organization establish new connections with scientists and conservationists. I will not be compensated for my time or services.
- the name and business of the person or organization for which the work will be done;  
Save the Snakes, a 501(c)(3) organization based in Sacramento, CA.
- the estimated time to be devoted to the activity;  
An average of 4-10 hours per month, although that range can fluctuate based on the type of events and meetings the organization convenes.
- whether the service will be performed entirely outside of normal duty hours (if not, estimate the number of hours of absence from work required);  
Yes, entirely outside of normal duty hours.
- a statement that no official duty time or Government property, resources, or facilities not available to the general public will be used in connection with the outside employment;  
I certify that I will not use any official duty time or EPA property, resources, or facilities not available to the general public in connection with the position.
- the basis for compensation (e.g., fee, per diem, per annum, etc.)  
No compensation will be provided to me.
- a statement that you have read, are familiar with, and will abide by the restrictions described in 5 CFR Part 2635 ([Subpart H on "Outside Activities"](#)) and 5 C.F.R. § 6401.103 ([EPA's Supplemental Regulations](#)); and  
Yes, I have read and will abide by the restrictions in 5 CFR Part 2635.
- an identification of any EPA assistance agreements or contracts held by a person to or for whom services would be provided.

The organization does not currently have any EPA assistant agreements or contracts, nor am I aware of any such agreements in the past.

Thanks,  
Jake

Ya-Wei (Jake) Li  
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Office of Chemical Safety and Pollution Prevention  
U.S. Environmental Protection Agency  
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